

4. Ameren's denial of discovery on incentive-based compensation for improving unit performance; and

5. Rule 26(e) supplementation of expert report of Dr. Ezra Hausman.

Ameren's Proposed Agenda Items

1. Request for Plaintiff's good faith memory-based search of all files of certain EPA custodians for documents pertaining to the could have accommodated provisions of the emission projection rule.

Respectfully submitted on this 18th day of June, 2014.

s/Andrew C. Hanson

Andrew C. Hanson
Bradford T. McLane
Nigel B. Cooney
Trial Attorneys
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
Telephone: (202) 305-0544
Facsimile: (202) 616-6584
Bradford.mclane@usdoj.gov

Suzanne Moore
Andrew Lay
Assistant United States Attorneys
United States Attorney's Office
Eastern District of Missouri
Thomas Eagleton U.S. Courthouse
111 South 10th Street, 20th Floor
St. Louis, Missouri 63102
Telephone: (314) 539-2547
Facsimile: (314) 539-2309
E-mail: Suzanne.Moore@usdoj.gov

Counsel for Plaintiff the United States of America

OF COUNSEL:

SEEMA KAKADE
Attorney-Advisor
U.S. EPA, Air Enforcement Division
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

ALEX CHEN
Senior Counsel
Office of Regional Counsel
U.S. EPA, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Respectfully submitted on this 18th day of June, 2014.

s/ Matthew B. Mock

Ronald S. Safer (pro hac vice)

Patricia Brown Holmes (pro hac vice)

Renee Cipriano (pro hac vice)

Steven J. Bonebrake (pro hac vice)

Matthew B. Mock (pro hac vice)

Schiff Hardin LLP

233 South Wacker Drive Suite 6600

Chicago, Illinois 60606

(312) 258-5500

Fax: (312) 258-5600

James J. Virtel

Armstrong Teasdale LLP

7700 Forsyth Boulevard Suite 1800

St. Louis, Missouri 63105

(314) 621-5070

Fax: (314) 612-2298

jvirtel@armstrongteasdale.com

Counsel for Defendant Ameren Missouri